UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JANE DOE, LUKE LOE, RICHARD ROE, and MARY MOE, individually and on behalf of all others similarly situated,

Plaintiffs,

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THE TRUMP CORPORATION, DONALD J. TRUMP, in his personal capacity, DONALD TRUMP JR., ERIC TRUMP, and IVANKA TRUMP,

Defendants.

NOTICE OF MOTION

Case No.: 1:18-cv-09936 (LGS)

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law,
Plaintiffs Jane Doe, Luke Loe, Richard Roe, and Mary Moe will move this Court at the United
States District Court for the Southern District of New York, Thurgood Marshall United States
Courthouse, 40 Foley Square, New York, New York, before the Honorable Lorna G. Schofield,
United States District Judge, on a date to be determined by the Court, for an order compelling
non-party ACN Opportunity, LLC to produce documents in response to Plaintiffs' subpoena

duces tecum. The bases for the motion are set forth in the accompanying Memorandum of Law.

Dated: January 31, 2020 New York, New York

EMERY CELLI BRINCKERHOFF & ABADY LLP

By: /s/ Andrew G. Celli

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